# USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: Christ St. John's Review Date: April 25, 2018

Lutheran School Date of Exit Conference: April 25, 2018

Agency Code: 327027

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

Determine whether the SFA meets program regulations,

- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School
  Nutrition Skills Development Courses (SNSDC) each summer in various locations around the
  state at no charge. Courses cover many areas of the school nutrition programs including
  administrative responsibilities, program basics, meal pattern requirements and menu planning,
  financial management, meal benefit determination process, professional standards,
  procurement, and many other topics. More information along with other upcoming trainings
  and webinars can be found on the Wisconsin DPI <u>School Nutrition Training</u> webpage
  (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, or communications and marketing. For more information go to the Wisconsin DPI <u>School Nutrition Training</u> webpage (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

## Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Christ St. John's Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. The foodservice director was very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the eagerness of the foodservice director and for her willingness to make changes to meet the NSLP regulations. The foodservice director is obviously concerned for the nutritional well-being of the school's students as evidenced through food safety, menus, service, and the local wellness policy.

The DPI review team is confident that Christ St. John's Lutheran School will continue to improve its knowledge and operation of the NSLP.

### **REVIEW AREAS**

### 1. MEAL ACCESS AND REIMBURSEMENT

## **Certification and Benefit Issuance**

### **Commendations:**

No application or benefit issuance errors were observed during the review. All applications were approved and denied correctly. Direct Certification runs were completed within the correct timeframes and retained onsite. Really great work!

## **Technical Assistance:**

- For school year 2017-18, <u>Sharing Information with Other Programs</u> was not sent to households with students receiving free and reduced priced meals
   (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs.doc).
- For anyone receiving eligibility information to approve students for non-food service program
  benefits after parental consent is received, the *Disclosure Agreement* form should be signed and
  on file at the district. A template <u>Disclosure of Free and Reduced Price Information</u> form is
  located on the SNT website (http://dpi.wi.gov/sites/default/files/imce/schoolnutrition/doc/disclosure-agreement.docx).

#### **Compliance Reminders:**

• "Error-prone applications" are those with reported income within \$100 monthly or \$1,200 yearly of the free and reduced price income eligibility levels.

# **Verification**

#### **Commendations:**

The application selected for Verification was correctly verified and the Verification Collection Report was correctly completed by February 1. Thank you!

## **Technical Assistance:**

- Verification was not completed until December 5, 2017. The due date is November 15 for each school year. This was most likely due to the SFA not starting the process until November 1, 2017, when the process can begin as early as October 1. Please be mindful of the Verification deadlines.
- Applications selected for verification must be pulled from the application pool existing on
  October 1 of each school year. The application pulled for verification was approved on October
  5, 2017, and therefore, was not a part of the October 1 pool of applications. The SFA did this to
  avoid verifying the same application two years in a row. However, this is allowable, and
  therefore, in the future, if the same application is the only one available on October 1, it must be
  the application selected for Verification.
- The Confirming and Verifying Officials signed the application upon its initial approval on October 5. These individuals only need to sign applications selected for verification, and therefore, should have signed the applications during the verification process.

## **Meal Counting and Claiming**

## Findings and Corrective Action Needed: Meal Counting and Claiming

☐ Finding #1: On the day of review, service began and a few students sat at their seats without being checked off at a point of service. The review team requested the foodservice director take counts as the employee portioning meals was not able to. Due to another employee leaving the SFA recently, food service was short-staffed. The SFA must determine if an additional staff member is required, or if the foodservice director will be available to take counts every day at lunch.

**Corrective Action Needed**: Please provide a statement detailing your solution and send it to the consultant assigned to your review.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### **Commendations**

Thank you to all staff at Christ St. John's Lutheran School for the warm welcome and cooperation during this Administrative Review (AR). Thank you to the Food Service Director for sending all documentation prior to the onsite visit as this greatly expedited the review. There were no meal pattern findings for the week of review. Signage at Christ St. John's Lutheran is colorful and visually pleasing, which makes for a great dining experience for students. There is a harvest of the month poster by the menu, which promotes Farm to School in Wisconsin. Great job offering many fresh fruit and vegetable options on the salad bar for students. There was even a flavor station by the salad bar with sodium-free options to add flavor to meals. The kitchen and dining area were clean and organized and staff were friendly and respective to students. Teachers do a nice job sitting and eating with students, which provide a role model for healthy eating. Great job serving healthy, nutritious meals to the students of Christ St. John's Lutheran School!

## **Technical Assistance**

## **Training**

Wisconsin DPI offers regular trainings through webcasts, webinars, and on-site trainings. Check the <u>training webpage</u> often for upcoming opportunities (dpi.wi.gov/school-nutrition/training). All members on the School Nutrition Team are also available for technical assistance any time throughout the year. The website offers a complete list of <u>DPI SNT staff</u> website (dpi.wi.gov/school-nutrition/directory).

## Child and Adult Care Food Program (CACFP)

The updated CACFP meal pattern was implemented on October 1, 2017, replacing the previous meal pattern options for SFAs serving infants and children aged 1-5 and not yet in kindergarten. The meal pattern requirements were updated to better align with the Dietary Guidelines for Americans, as required by the Healthy, Hunger-Free Kids Act of 2010. The changes were also based on scientific recommendations from the National Academy of Medicine and stakeholder input. Meals served under the updated CACFP meal pattern include a greater variety of vegetables and fruits, more whole grains, and less added sugar. More information regarding the updated CACFP meal pattern is available on the Infants and Preschool in NSLP and SBP webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

## Co-mingling Flexibility Misuse (Lunch)

Preschool students are allowed to follow the K-5 (or K-8) menu at lunch *if* they are served at the same time and in the same place as the other age/grade groups. During the on-site observation at lunch, preschool (pre-K) students were served the K-5 menu, but were not served at the same time and in the same place as the K-5 students. They came through the line as one class, therefore it was easy to determine which students were pre-K. Children who are not yet in kindergarten must be served the CACFP meal pattern if not co-mingled with other age/grade groups. Training and additional resources can be found on the <a href="Infants and Preschool in NSLP">Infants and Preschool in NSLP and SBP</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

#### **CACFP Meal Pattern**

Refer to the <u>meal pattern table</u> to ensure all meals meet the updated CACFP meal pattern (https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\_childmealpattern.pdf).

## CACFP, OVS

Under the updated CACFP meal pattern, OVS is not an appropriate service style for pre-K students. It may interfere with the nutrition goals of the CACFP meal pattern, as well as the goal of introducing new foods to children while they are still developing food preferences. Instead, pre-K students should be served all the required components in at least the minimum amounts at each meal or the SFA may implement family style meal service. For more information, please visit the <a href="Infants and Preschool in NSLP and SBP">Infants and Preschool in NSLP and SBP</a> webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/infants-and-preschool).

## **CACFP**, Grain-based desserts

Grain-based desserts are not creditable toward the grains component under the updated CACFP meal pattern. These include foods such as cookies, sweet pie crusts, doughnuts, granola bars, cereal bars, toaster pastries, cakes, and brownies. Items with names such as "breakfast rounds" resemble grain-based desserts and are not a creditable grain. Homemade items and desserts made with whole grains or more nutritious ingredients like black beans, applesauce, or vegetable puree are still considered grain-based desserts and do not credit toward the grains

component. When determining whether a food is a grain-based dessert, the menu planner should consider whether the food is thought of as a dessert or treat. For a complete list of foods considered to be grain-based desserts, please refer to <a href="Exhibit A">Exhibit A</a> (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/cacfp-16-2017.pdf).

## CACFP, Milk Types

Under the updated CACFP meal pattern, flavored milks are not allowable. Children 2-5 years old and not yet in kindergarten should be served unflavored low-fat (1%) or unflavored fat-free (skim) milk. Discontinue serving skim chocolate milk to pre-k students. The Smarter Lunchrooms Movement has strategies to <a href="mailto:encourage-the-consumption-of-unflavored-milk">encourage the consumption of unflavored milk</a> (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

### **Contact Information**

For questions about the updated CACFP meal pattern, please contact our DPI specialists: Tanya Kirtz at <u>Tanya.Kirtz@dpi.wi.gov</u> or Erin Opgenorth at <u>Erin.Opgenorth@dpi.wi.gov</u>.

## School Breakfast Program (SBP)

Consider participating in the SBP, which will enable the SFA to help students start their school day with good nutrition and provide reimbursement to you for doing so. More information is available on the <a href="School Breakfast Program">School Breakfast Program</a> webpage (http://dpi.wi.gov/school-nutrition/school-breakfast-program).

### Standardized Recipes

Any menu item that is made in-house with more than one ingredient must have a standardized recipe. This is defined as one that has been tried, tested, evaluated, and adapted for use by your food service operation. It produces a consistent quality and yield each time when the exact procedures, equipment, and ingredients are used.

Recipes should be updated to reflect current practices and products. Standardized recipes exist, but many are not accurately reflecting what is happening in the kitchen. For example, an *On, Wisconsin!* Chicken Noodle Soup recipe was provided for the week of review with specific ingredients and measurements. When reviewing the recipes binder onsite, the recipe was actually prepared with different ingredient amounts and a few items were even added. These changes should be reflected on a standardized recipe specific to Christ St. John's operation.

The following recipes sent during the week of review do not reflect what is done in practice:

- Toasted Cheese Sandwich:
  - Recipe states ½ sandwich for K-8 and 1 sandwich for 9-12. There are no grades 9-12 at Christ St. John Lutheran and 1 sandwich is what is actually being served. Therefore, the recipe should be updated to reflect the grade groups in the school, what ingredients are actually being used and in their appropriate quantities, and the serving size should reflect what is actually being served.
- Chicken Noodle Soup:
  - Recipe states 1 cup as the serving size, yet production records state ½ cup as the serving size. Therefore, the recipe should be updated to reflect this serving size. Onsite observation of the recipe binder also showed that the amounts listed on the recipe and not actually what is being used. There was even an ingredient added that was not on the recipe.
- Loaded Turkey Sub:

• Recipe states ½ sandwich as the serving size, yet production records state 1 each. After further discussion with the Food Service Director, 1 sandwich is the actual serving size. Therefore, the recipe should be updated to reflect this.

Guidance on what a standardized recipe should include can be found on our Recipe Resources and Tools webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menuplanning/recipes). There is also a checklist of information necessary to standardize a recipe, calculators to assist with a nutrient analysis, and a template to help organize the information.

### Meal Service Line, Set Up

During meal service observation, the line moved slowly. Consider reorganizing the line for more self-service of menu items, or have a teaching aid help serve food so students have enough time to go through the line and eat lunch. It is difficult for one staff member to serve food, take meal counts, and ensure food is stocked.

### **Condiments**

Condiments can be significant sources of calories, saturated fat, and sodium in a meal, especially when usage is not controlled. Condiment usage is not monitored nor are portion sizes communicated to students. Consider monitoring your school's condiment usage and communicate appropriate portion sizes to students. Do this by adding signage at the condiment station with a photo of what one tablespoon of Ranch Dressing looks like, purchasing single-use one ounce cups to aid in portion control, or using signage such as "One squeeze, please!" on self-serve squirt bottles. More information on sodium targets is on the Menu Planning webpage (dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning) under the Sodium heading.

## Meal Patterns, condensing

Rather than serving a K-5 meal pattern and a 6-8 meal pattern, it may be beneficial to simplify to a K-8 meal pattern for all K-8 students. A K-8 meal pattern makes menu planning easier for school nutrition professionals, and Offer Versus Serve is in place to minimize food waste. Because there are pre-K students that must follow the CACFP meal pattern, you may adjust your production records to have a 3-4K section and a K-8 section. A sample production record was developed and sent to the Food Service Director onsite.

#### **Production Records**

Production records are intended to be useful tools to record information prior to production, during production, and following production. The production record template currently in use has missing information, such as serving sizes and total number of servings planned. Planned portion sizes are required for every meal component so staff understand how much to offer each student to meet meal pattern requirements. While there is no required production record template, there are examples that may be used on our <a href="Production Records">Production Records</a> webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records). A copy of the production record requirements ("Must Haves and Nice to Haves" list) can also be found at that link.

Each item must also be listed separately on production records unless there is a standardized recipe. For example, during the week of review the alternate menu option of an Uncrustable, cheese stick and chips were all written on one line with no serving size. Because there is no standardized recipe for the alternate entree meal, each item must be listed separately with their individual serving size.

Production records are useful tools with historical data to better forecast for future menus. There is a large amount of cheese put out on the salad bar daily, however much is leftover (i.e. 33 ounces put out, yet 30 ounces were leftover and only 3 ounces used). Consider using past production records to forecast appropriate amounts of ingredients to put out on the salad bar to reduce waste and labor.

## Findings and Corrective Action Needed: Meal Pattern and Nutritional Quality

☐ Finding #2: Standardized recipes specific to Christ St. John's Lutheran school need to be developed for the Toasted Cheese Sandwich, Chicken Noodle Soup, and Turkey & Cheese Sub served during the week of review.

**Corrective Action Needed:** Submit standardized recipes for the items listed above with all required items (e.g. yield, detailed instructions, serving size). A <u>Recipe Template</u> may be used (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc).

☐ Finding #3: A column for serving sizes is not currently on production records.

**Corrective Action Needed:** Submit an updated production record template with a column for serving sizes.

#### 3. RESOURCE MANAGEMENT

## Nonprofit School Food Service Account

The SFA currently has an Excess Cash Balance and therefore, a comprehensive review of the nonprofit foodservice account was completed.

### **Commendations:**

The foodservice director has a great deal of knowledge regarding the nonprofit foodservice account. She does a wonderful job tracking all revenues and expenditures and ensuring there are no indirect or unallowable costs related to the account. The unpaid meal charge policy was completed and sent to households before the beginning of the school year. Thank you!

### **Technical Assistance:**

• The school food service fund may not have an ending fund balance in excess of 3-month operating expenses, as this is considered "Excess Cash Balance". While we commend your staff for the fiscal viability of the child nutrition programs, federal regulations limit net cash resources to an amount not to exceed a three month average of operating expenses to remain in compliance with a non-profit status.

Findings and Corrective Action Needed: Nonprofit School Food Service Account

☐ Finding #4: The revenues and expenditures within the Annual Financial Report (AFR) are all reported under NSLP food. Revenues and expenditures must be allocated toward food and labor as well as non-program foods.

**Corrective Action Needed**: Please re-submit your AFR to <u>Jacque Jordee</u> and notify the consultant assigned to your review when the changes have been successfully made (jacqueline.jordee@dpi.wi.gov).

☐ Finding #5: The SFA currently has an Excess Cash Balance.

**Corrective Action Required:** Please submit a detailed explanation to the consultant assigned to your review as to how this excess cash balance will be spent.

## **Revenue from Non-program Foods**

Only milks and adult meals are sold as non-program foods at the SFA, and therefore, the non-program foods revenue tool is not required to be completed. All revenues from the non-program foods are covering the non-program food expenditures. Great work!

## **Indirect Costs**

### **Commendations:**

Indirect costs were not observed during the review. Great work!

## **Compliance Reminders:**

- DPI does not allow the annual assigned indirect cost rate to be applied to Fund 50 (Foodservice
  account within WUFAR). For both public and private schools in Wisconsin, any costs assessed to
  foodservice must be based on documented and justifiable costs for each school building as they
  pertain to your school situation rather than an indirect cost rate. This may include utilities, rent,
  printing and mailing services, administrative oversight, etc.
- Allowable costs to foodservice must be supported with documentation for items such as gas, electricity, waste removal, fuel, water, etc. for the school district.

### 4. GENERAL PROGRAM COMPLIANCE

## **Civil Rights**

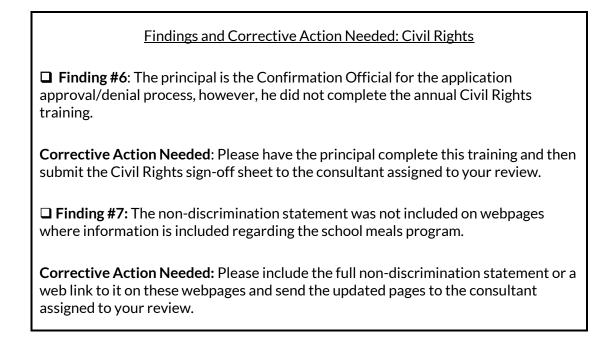
#### **Commendations:**

Thank you for completing the PI-1441 Civil Rights compliance form and Public Release! The "And Justice For All" poster is also prominently displayed in a publicly visible location.

# **Compliance Reminders:**

- All SFAs are required to distribute a <u>Public Release</u> before the start of the school year. The purpose is to inform the public that free and reduced price meals and free milk are available. SFAs must annually distribute the Public Release to:
  - Local news media
  - Grassroots organizations (local organizations providing services to populations in need)
  - Major employers contemplating or experiencing large layoffs

- Local Unemployment Office (as applicable)
- SFAs are not required to pay to have the public release published but must maintain documentation of whom it was sent to along with the specific materials distributed.
- The non-discrimination statement is required to be on any document and/or resource sent out to the public containing information related to the school meals programs. This includes all paper and electronic versions of documents.
- When including the <u>non-discrimination statement</u> on letters, menus, website, and other documents, it is necessary to use the current statement which was updated in 2015 (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights). However, when space is very limited, such as on the printed menus or low balance notices, the abbreviated statement may be used, "This institution is an equal opportunity provider." Either of these statements must be in the same size font as the other text in the document.



### **Local Wellness Policy**

### **Commendations:**

A wonderful Local Wellness Policy (LWP) has been put in place by the SFA. Thank you!

Findings and Corrective Action Needed: Local Wellness Policy
☐ <b>Finding #8:</b> The LWP is missing language regarding the required triennial assessment of the policy.
<b>Corrective Action Needed:</b> Please send the updated LWP to the consultant assigned to your review.

## **Resources:**

 The <u>Local Wellness Policy Checklist</u> includes all required components of the LWP (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/local-wellness-policy-checklist.pdf).

## **Professional Standards**

Great work tracking all nutrition staffs' required annual professional standards trainings! All trainings were job-specific and all nutrition staff completed well beyond the required number of trainings hours. Great work!

### **Water**

Thank you for having free, potable water accessible to all students without restriction during meal services!

### **Food Safety and Storage**

#### **Commendations:**

Thank you for having a site-specific food safety plan onsite with all required components. Great work including a Time as a Public Health Control Standard Operation Procedure (SOP) as well! Thank you for taking the initiative to develop this procedure. Additionally, all Employee Reporting Agreements were available onsite for review.

#### **Technical Assistance:**

• Currently, the SFA's kitchen is utilized by both food service and other SFA groups. While there are no issues currently, it is recommended the SFA develop a **kitchen usage policy** in the future. The purpose would be, for example, to avoid any USDA foods being used by another group, to ensure all food safety procedures are being followed, and to keep track of sanitization.

# **Buy American**

### **Compliance Reminders:**

- The USDA requires that an SFA purchase, to the maximum extent practicable, domestic
  commodities or products. Using food products from local sources supports the local economy,
  farmers, and provides healthy choices for children in the USDA School Meal Programs. The Buy
  American provision is required whether food products are purchased by SFAs or entities that
  are purchasing on their behalf.
- Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification.
- More information on this new requirement, including a tool to assist with tracking noncompliant products, can be found on the SNT <u>Procurement</u> webpage (http://dpi.wi.gov/school-nutrition/procurement/buy-american).

Findings and Corrective Action Needed: Buy American

☐ Finding #9: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American – Noncompliant List, or SFA equivalent form: Mandarin Oranges (China)

**Corrective Action Needed:** Complete and submit Non-Compliant Product Form for the products listed above (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-noncompliant-list.docx).

# **Reporting and Recordkeeping**

## **Commendations:**

All records are retained for the required three years plus the current school year. Thank you!

### Summer Food Service Program (SFSP) Outreach

## Findings and Corrective Action Needed: SFSP

☐ Finding #10: While the SFA does not offer free summer meals, it is required to notify households of the location(s) of free meals offered during the summer months before the end of the academic year.

**Corrective Action Needed:** Utilizing the resources, please send along SFSP information to all households before the end of the academic school year. Please send a copy of this information to the consultant assigned to your review.

### **Resources:**

## Summer Meals:

- A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year-round. SFAs can inform families of summer meals via the following methods:
  - Promotion of the <u>summer meals locator</u> on the DPI Summer Meals webpage (https://dpi.wi.gov/community-nutrition/sfsp/find-summer-meals-site)
  - o Promotion of calling 211 to locate meals in the area
  - Promotion of the ability to text 'food' to 877-877 to locate meals in the area
  - Promotion of the USDA <u>Summer Food</u> website (http://www.fns.usda.gov/summerfoodrocks)
- To access an inclusive map of all potential participating sites in your area, see the <u>interactive</u> map on the SFSP website (http://www.fns.usda.gov/capacitybuilder).
- For more information on Summer Feeding option contact:
   Amy J. Kolano, RD, CD, Summer Food Service Program Coordinator
   Phone: (608) 266.7124; e-mail: amy.kolano@dpi.wi.gov

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure student success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage (dpi.wi.gov/statesupt/agenda-2017).



With School Nutrition Programs!